



**DEPARTMENT OF THE AIR FORCE
27TH SPECIAL OPERATIONS WING (AFSOC)
CANNON AIR FORCE BASE NEW MEXICO**

MEMORANDUM FOR RECORD

August 19, 2021

FROM: 27 SOW/CC

SUBJECT: Establishment of a Restoration Advisory Board (RAB)

1. In accordance with DoDM 4715.20, Defense Environmental Restoration Program (DERP) Management, Encl 3, para 16.c(3), this memorandum for record documents my decision not to establish a RAB for Cannon Air Force Base (CAFB) at this time. I based my decision on a determination that there is not sufficient and sustained community interest in establishing a RAB for Air Force environmental restoration programs (ERP) at CAFB.
2. A RAB is an opportunity for stakeholder involvement in the environmental restoration/cleanup process at Department of Defense (DoD) installations. 32 C.F.R. §202.1(a)(1): It is a forum for early and continued exchange of information and dialogue between DoD installations, regulatory agencies, tribes, and the community. 32 C.F.R. §202.1(b)(2): RAB members review progress, participate in dialogue with, and provide comments and advice to the installation's decision makers on environmental restoration matters; however, they do not make any decisions. 32 C.F.R. §202.1(b)(3): A RAB should be established when there is sufficient and sustained community interest, and any of the following criteria are met: the closure of the installation involves the transfer of property to the community; at least fifty local citizens petition the installation for creation of a RAB; federal, state, tribal or local government representatives request the formation of a RAB; or the installation determines the need for a RAB. 32 C.F.R. § 202.2(a)(1)–(4): As noted above and in the RAB Rule Handbook issued by the Office of the Secretary of Defense, sustained interest shows commitment from the community and is an important factor when deciding if a community is prepared to maintain a RAB during an installation's environmental activities.
3. On February 17, 2021, CAFB disseminated RAB interest surveys to comply with the biennial solicitation requirement to gauge community interest in establishing a RAB for its ERP. The methods for conducting this survey included a mail announcement to 15 addresses from the New Mexico Environmental Department Cannon mailing list. Email notification to Stephanie Stringer, NMED, and Todd Ringler from Congressmen Lujan's office. A notice of the survey was also published in The Eastern New Mexico newspaper on [February 17 – March 31, 2021 every Sunday and Wednesday]. The survey stated the focus of a RAB would be on all ERP projects. The survey clarified the definition and purpose of a RAB and the level of commitment expected of RAB members. A press release published in KRQE New Mexico News, MYhighplains.com by KAMR/KCIT, The Eastern New Mexico News, posted on Curry County, NM Facebook, Cannon Facebook, and at Clovis Library [January 27th & 27th, and February 17th]. 58 people responded via email and 1 petition with 49 signatures, with only 4 people stating they were willing to serve on a RAB and provided their contact information. The petition specifically stated the want of a RAB for the clean water due to the dumping of Toxic PFAS chemicals in the soil, and 46 of the people responded specifically stated they wanted the RAB for the cleanup of the water due to impact from PFOS/PFOA. On March 24, 2021 the Clean Water Partnership (CWP) posted on their Facebook page template email language for people to use for responding to the RAB which led them to believe the RAB was the first step towards remediating the PFOS/PFOA impact. 26 of the 58 emails used this language and another 18 stated they supported the RAB so the water would be cleaned. Some of the 18 initial email stated they supported the RAB, but when asked to elaborate why they supported it, they said to clean up the water. The Cannon Restoration Program has demonstrated the only impact to groundwater is PFOS/PFOA. Until the CWP provided the misleading information, Cannon had

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only received 4 emails from February 17th to March 23rd, and those were directed at the PFOS/PFOA investigation. This demonstrates the community is not interested in a RAB. The RAB solicitation closed on April 3, 2021.

4. The Curry County Commissioner was opposed to the formation of a RAB, stating it would eliminate on-going Quarterly Public Updates outreach efforts and distract from the communities focus on the PFOS/PFOA investigation.

5. Based on this information, I conclude there is not enough interest in forming a RAB. CAFB made a good-faith effort to determine whether there is a sufficient and sustained interest in the community to establish a RAB through the level and breadth of interest solicitation via email, mail, and follow-up meetings with stakeholders. Only 4 of the 58 people who responded to the survey and provided their contact information expressed interest in serving on the RAB. Moreover, the government agencies who weighed in stated the RAB was either not necessary, were neutral on the issue, or had shown interest when asked about requirements for establishing a RAB. Based on these factors, I conclude there is not sufficient and sustained interest in the community at this time to establish a RAB.

6. There was no indication of any community interest in other ERP projects on CAFB besides the PFOS/PFOA investigation project. However, the scope of a RAB's focus must be broader than one restoration site or activity to include all restoration activities on base (See 10 U.S.C. § 2705(f), 32 CFR 202.1(b), DoDM 4715.20, para 16.c, and AFI 32-7020, sect 11.4. "Restoration activities" and "Restoration program" include more than one cleanup project or issue). CAFB currently has strong public engagement on the PFOS/PFOA investigation and is effectively addressing community concerns about transparency and oversight regarding the investigation. Each technical briefing and related developments are open to public comment, and questions and concerns are addressed in a public forum, where news media and the general public have access. Cannon AFB maintains an environmental portal for the PFOS/PFOA investigation at <https://www.cannon.af.mil/Environmental/>, and all documents related to the project are available to the public through the AFCEC Administrative Record located at <https://ar.afcec-cloud.af.mil/>. The RAB will take away from the current PFOS/PFOA engagement program, as it will divert resources away from the current programs and into the RAB. This is due to Federal Regulations which prohibit using federal/public funds to support duplicative efforts, and in this case, project outreach activities. Programs which risk discontinuation include project-specific meetings, and partnerships with regulators.

7. CAFB will review community interest to establish a RAB at least every 24 months, while environmental restoration activities are still ongoing, per the RAB Rule Handbook, Office of the Secretary of Defense (March 2007), page 6; and AFI 32-7020, The Environmental Restoration Program, para. 11.4.1.



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